

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SAMUEL KARNES, MOLLY WASHAM, ADAM
BETTENCOURT, and LAURA PETREE,
Plaintiffs,

**STIPULATION AND
ORDER OF DISMISSAL**

-against-

21 CV 4903 (WFK) (JRC)

THE CITY OF NEW YORK; MAYOR BILL DE
BLASIO; NEW YORK CITY POLICE
DEPARTMENT ("NYPD") COMMISSIONER
DERMOT SHEA; NYPD CHIEF OF DEPARTMENT
TERENCE MONAHAN; NYPD DETECTIVE
MICHAEL MCCAFFREY; NYPD SERGEANT
GERARD M. CAFFREY; NYPD DETECTIVE
DANIEL HERZOG; NYPD OFFICER FNU MOSES
and NYPD MEMBERS JOHN AND JANE DOES 1-
18,

Defendants.
----- X

WHEREAS, plaintiffs Karnes and Bettencourt and defendants have reached a settlement agreement and now desire to resolve the remaining issues raised in this litigation with respect to the claims brought by plaintiffs Karnes and Bettencourt, without further proceedings and without admitting any fault or liability;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by
and between the undersigned, that


1. The above-referenced action is hereby dismissed with prejudice solely in connection with the claims brought by plaintiffs Karnes and Bettencourt; and

2. Notwithstanding the dismissal of this action solely in connection with the claims brought by plaintiffs Karnes and Bettencourt in accordance with this agreement, the District Court shall continue to retain jurisdiction over this action for the purpose of enforcing the terms of the settlement agreement reached between the parties and set forth in the Stipulation of Settlement executed by the parties in this matter.


Dated: New York, New York
January 18, 2024

COHEN & GREEN PLLC
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By: 

Elena Cohen, Esq.
Attorney for Plaintiffs

By: 

Brian Francolla
Senior Counsel

SO ORDERED:

HON. WILLIAM F. KUNTZ
UNITED STATES DISTRICT JUDGE

Dated: _____, 2024